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**Re: Jones v. Enterprise Holdings, Inc. - Protective Order**


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**From** tjones@invictarealtyllc.com <tjones@invictarealtyllc.com>

**Date** Wed 5/1/2024 8:13 PM

**To** McLeod, Kaitlin E. <kmcleod@bakerlaw.com>

**Cc** McIntyre, M. Scott <smcintyre@bakerlaw.com>

 1 attachments (48 KB)

One-Tier Form Protective Order.docx;

Greetings,

It is not likely that I will sign the proposed protective order. The primary reason for this is I find the proposed order to be limited in scope and believe that it will create issues regarding confidential information when this case proceeds to trial.

Also, while the proposed order identifies the categories of Plaintiff's documents that will be considered confidential, the proposed order doesn't identify any of the categories of the Defendants documents that will be considered confidential. I cannot sign any protective order before inspecting the documents that will be considered confidential. I believe that I will disagree with many of the documents that the Defendants will label as confidential and the proposed order is essentially a blanket protective order.

The Court has drafted their own versions of protective orders that I am willing to sign if the stipulations below are met as the Court's version is detailed and thorough. I have attached the draft One-Tier Protective Order from the court to this email for your review. The applicable information for the court's draft protective orders can be found at the following link:

<https://www.ohsd.uscourts.gov/protective-orders>.

**Stipulations:**

1. The proposed order identifies the following categories of confidential information related to Plaintiff's discovery:
  - a. Medical Records
  - b. Financial Information
  - c. Employment Records
  - d. Confidential, private, or personal information (including Personally Identifiable Information)
2. The proposed order identifies the categories of confidential information related to Defendants' discovery.
3. The draft One-Tier Protective Order is modified only to include the information stipulated in 1 & 2 above and sent to me for review.

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**From:** McLeod, Kaitlin E. <kmcleod@bakerlaw.com>

**Sent:** Wednesday, May 1, 2024 1:12 PM

**To:** tjones@invictarealtyllc.com <tjones@invictarealtyllc.com>

**Cc:** McIntyre, M. Scott <smcintyre@bakerlaw.com>

**Subject:** RE: Jones v. Enterprise Holdings, Inc. - Protective Order

Good Afternoon,

I wanted to follow up to see if the proposed protective order is acceptable to you?

Thanks,  
Kaitlin

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**From:** McIntyre, M. Scott <smcintyre@bakerlaw.com>

**Sent:** Friday, April 26, 2024 5:37 PM

**To:** McLeod, Kaitlin E. <kmcleod@bakerlaw.com>; tjones@invictarealtyllc.com <tjones@invictarealtyllc.com>

**Subject:** RE: Jones v. Enterprise Holdings, Inc. - Protective Order

Thanks, Kaitlin. Mr. Jones, please let us know if this is acceptable to you. We can then file with the Court and plan on getting discovery responses to you on May 3.

Sincerely,  
Scott

**M. Scott McIntyre**

Partner

Certified Specialist in Employment & Labor Law

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**From:** McLeod, Kaitlin E. <[kmcleod@bakerlaw.com](mailto:kmcleod@bakerlaw.com)>

**Sent:** Friday, April 26, 2024 5:21 PM

**To:** tjones invictarealtyllc.com <[tjones@invictarealtyllc.com](mailto:tjones@invictarealtyllc.com)>

**Cc:** McIntyre, M. Scott <[smcintyre@bakerlaw.com](mailto:smcintyre@bakerlaw.com)>

**Subject:** Jones v. Enterprise Holdings, Inc.- Protective Order

Good Evening,

Please find Defendant's proposed protective order. We would like to get a protective order on the record for both Defendant's and Plaintiff's benefit before we produce any confidential documentation.

Thanks,

**Kaitlin McLeod**

She | Her | Hers

Associate

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**BakerHostetler**

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